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BY HAND

December 17, 2009

Re: *Anwar et al. v. Fairfield Greenwich Limited et al.*,
No. 09 Civ. 00118 (VM)(THK)

Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan United States Courthouse,
Room 755
500 Pearl Street
New York, NY 10007

Dear Judge Marrero:

We write on behalf of the Fairfield-related Defendants¹ in the above-referenced matter concerning their motions to dismiss the Second Consolidated Amended Complaint (the “Complaint”), which are scheduled to be filed on Tuesday, December 22, 2009.

In their 572-paragraph Complaint, which spans over 200 pages, Plaintiffs assert 33 counts against more than 40 defendants represented by multiple law firms. The 28 Fairfield-related Defendants, represented by 8 law firms, have been coordinating in an effort to present Your Honor with briefing on their motions to dismiss that minimizes duplication and organizes the issues in a sensible and efficient manner. We have conferred with all counsel for the Fairfield-related Defendants. While a few have not reached a final decision, the majority have advised us that they do not intend to file individual motions to dismiss on behalf of their clients. Instead, they will sign on to one of three memoranda of law in

¹ We are counsel for Defendants Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda) Ltd., Fairfield Greenwich Advisors LLC, Fairfield Risk Services Ltd., Fairfield Heathcliff Capital LLC, Lourdes Barreneche, Vianney d’Hendecourt, Harold Greisman, Jacqueline Harary, Richard Landsberger, Daniel Lipton, Julia Luongo, Mark McKeefry, Santiago Reyes, Yanko Della Schiava, Andrew Smith, Maria Teresa Pulido Mendoza, Charles Murphy, Corina Piedrahita and Philip Toub. Defendants Walter Noel, Jeffrey Tucker, Andres Piedrahita, Amit Vijayvergiya, David Horn, Robert Blum, Cornelis Boele, and Gregory Bowes are represented by 7 other law firms.

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support of the motions to dismiss we will be filing based on Plaintiffs' grouping of the Fairfield-related Defendants into three categories.²

We understand that the Court has established a page limit for memoranda of law in support of a motion to dismiss. We anticipate that two of our three briefs will be within that limit. However, given the number of Defendants on whose behalf our briefing will be submitted, and the number of issues required to be addressed, we anticipate that the third brief will exceed that limit. We therefore write to request the Court's permission to file a third brief of up to 120 pages in length. Again, there are many issues to be addressed in Plaintiffs' 572-paragraph Complaint, which spans over 200 pages, and despite much overlap in the issues, there are also unique arguments that we must include that apply to particular Defendants, groups of Defendants, or particular claims. We understand the advantages of brevity and will attempt to limit the third brief to less than 120 pages to the extent possible.

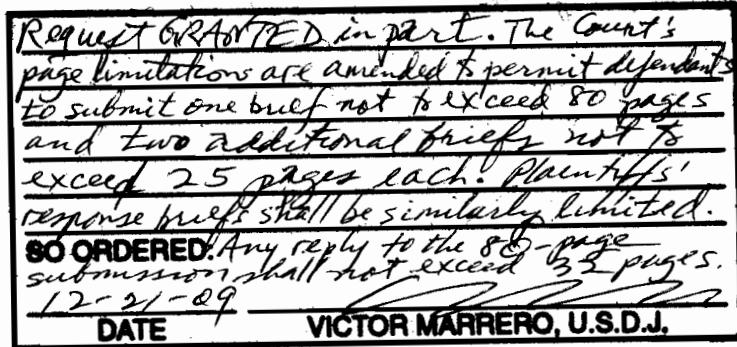
We have conferred with Interim Co-Lead Counsel for Plaintiffs on this request. They have advised us that they consider Defendants' request for expanded page limits to be a matter for the Court's discretion and take no position, other than to request that Plaintiffs be afforded an extension of the page limits for their opposition papers commensurate with the total amount of briefing allowed to all Defendants.

We appreciate Your Honor's consideration of this request.

Respectfully,


Mark G. Cunha

cc: All Counsel in Anwar



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Counsel who remain undecided have advised us that in the event that they file a separate motion to dismiss, they expect to largely adopt the arguments we make in our briefing.